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DIRECTOR
ELECTRIC, NATURAL GAS
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November 18, 2014

## VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk and Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210

RE: Joint Petition of Tri-County Electric Cooperative, Incorporated and South Carolina Electric & Gas Company for the Assignment and Reassignment of Territory in Orangeburg County and Approval of an Agreement to Limit Corridor Rights in Lexington and Richland Counties.

Docket No. 2014-439-E

Dear Ms. Boyd:

The Office of Regulatory Staff ("ORS") has reviewed the Joint Petition of Tri-County Electric Cooperative, Incorporated ("Tri-County") and South Carolina Electric & Gas Company ("SCE&G") (Collectively "the Parties") to assign and reassign territory in Orangeburg County and limit corridor rights in Lexington and Richland Counties ("Joint Petition").

Under S.C. Code Ann. §58-27-650(A) (Supp. 2013), the South Carolina Public Service Commission ("Commission") may reassign a portion of previously assigned service areas upon agreement of the affected electric suppliers. The Joint Petition includes the request to (A) assign certain territory in Orangeburg County to Tri-County, (B) reassign certain territory in Orangeburg County from SCE&G to Tri-County, and (C) limit corridor rights in specific areas of Lexington and Richland Counties. The Joint Petition asserts that no current customers of the Parties in these areas will be affected.

Under S.C. Code Ann. §58-27-620 (8) (Supp. 2013), the Commission may approve agreements between electric suppliers concerning corridor rights. The Parties request approval of their agreement to abandon certain corridor rights as described and delineated in the filing.

The Parties assert their agreement resulted from lengthy good faith negotiations and the desire to avoid wasteful duplication of electric distribution lines and to operate those systems safely. In addition, the Parties have given careful consideration to system economy, service reliability and good utility practice, efficiency and safety.

Based on discussions with SCE&G personnel and the information reviewed, ORS does not have an objection to the Joint Petition as set forth by the Parties. If approved, ORS recommends requiring the Parties to file amended territorial assignment maps for Orangeburg County to reflect the modifications requested in the Joint Petition.

Thank you for the opportunity to provide comments in this matter.

Sincerely,

John W. Flitter

JWF/swh

cc: Nanette S. Edwards, Deputy Executive Director, ORS

Jeffrey M. Nelson, Chief Counsel and Director of Legal Services, ORS

K. Chad Burgess, Associate General Counsel, SCANA Frank R. Ellerbe, Counsel, Robinson, McFadden & Moore

Dr. James Spearman, Executive Assistant, PSCSC